

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
CHASHA KUZECKI,

Answer

Plaintiff(s),

-against-

11-4899
(Johnson, J.)

CAPITAL MANAGEMENT SERVICES, LP.,

Defendant(s).
-----x

Defendant, CAPITAL MANAGEMENT SERVICES, LP., by its attorney Mel S. Harris and Associates, LLC, answers plaintiff's complaint as follows:

1. Defendant acknowledges being sued pursuant to the Fair Debt Collection Practices Act, but deny any violation thereof.
2. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "2" of the complaint.
3. Defendant admits the allegations contained in paragraph "3" of the complaint.
4. Defendant admits the allegations contained in paragraph "4" of the complaint.
5. Defendant admits the allegations contained in paragraph "5" of the complaint.
6. Defendant admits the allegations contained in paragraph "6" of the complaint.

7. Defendant admits the allegations contained in paragraph "7" of the complaint.

8. Defendant admits the allegations contained in paragraph "8" of the complaint.

9. Defendant admits the allegations contained in paragraph "9" of the complaint.

10. Defendant admits sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "10" of the complaint.

11. Defendant admits sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "11" of the complaint.

12. Defendant denies each and every allegation contained in paragraph "12" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "14" of the complaint do not apply to the answering Defendant.

15. Defendant provisionally denies the allegations in paragraph "15" as it has not been furnished with the collection letter referenced in the complaint.

16. This allegation is a statement of law that requires no response.

17. This allegation is a statement of law that requires no response.

18 Defendant denies each and every allegation contained in paragraph "18" of the complaint.

19. This allegation is a statement of law that requires no response.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

22. Defendant denies each and every allegation contained in paragraph "22" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

24. Defendant denies each and every allegation contained in paragraph "24" of the complaint.

25. Defendant denies each and every allegation contained in paragraph "25" of the complaint.

26. Defendant denies each and every allegation contained in paragraph "26" of the complaint.

27. Defendant denies each and every allegation contained in paragraph "27" of the complaint.

28. Defendant denies each and every allegation contained in paragraph "28" of the complaint.

29. Defendant denies each and every allegation contained in paragraph "29" of the complaint.

30. Defendant denies each and every allegation contained in paragraph "30" of the complaint.

31. Defendant denies each and every allegation contained in paragraph "31" of the complaint.

32. Defendant denies each and every allegation contained in paragraph "32" of the complaint.

33. Defendant denies each and every allegation contained in paragraph "33" of the complaint.

34. Defendant denies each and every allegation contained in paragraph "34" of the complaint.


35. Defendant denies each and every allegation contained in paragraph "35" of the complaint.

36. Defendant admit the allegations contained in paragraph "36" of the complaint.

37. Defendant deny each and every allegation contained in paragraph "37" of the complaint.

WHEREFORE, the Defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY
December 13, 2011



Arthur Sanders (AS1210)
MEL S. HARRIS AND ASSOCIATES, LLC
Attorneys for Defendant
5 Hanover Square - 8th Floor
New York, NY 10004
212-660-1050

TO:

Adam J. Fishbein, Esq.
Attorney(s) for plaintiff(s)
483 Chestnut Street
Cedarhurst, NY 11516
FishbeinAdamJ@gmail.com